

JUL -11' 02 (THU) 12:06

HESLIN ROTHENBERG

TEL: 518 452 5579

P. 001

Official

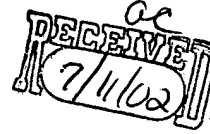
HESLIN ROTHENBERG FARLEY & MESITI P.C.

Robert E. Heslin
Jeff Rothenberg
Kevin P. Radigan
Susan E. Farley
Nicholas Mesiti
Philip E. Hansen
Blanche F. Schiller
Wayne F. Reinke
Candice J. Clement
David P. Miranda

*Patent Agent
†Other than NY Bar

INTELLECTUAL PROPERTY LAW
PATENTS • TRADEMARKS • COPYRIGHTS

Attorneys at Law
5 Columbia Circle
Albany, New York 12203
Telephone: (518) 452-5600
Facsimile: (518) 452-5579
www.hrlmlaw.com



Kathy Smith Dias
Mary Louise Gioeni
David A. Pascarella
Victor A. Cardona
Lee Palmateer
John Picurungelo
Alison E. Gugel
Brett M. Hutton
James M. Syta
Inequeline M. Arendt

Martha L. Boden
Of Counsel

CONFIDENTIALITY NOTICE

THE PAGES COMPRISING THIS FACSIMILE TRANSMISSION CONTAIN CONFIDENTIAL INFORMATION FROM **HESLIN ROTHENBERG FARLEY & MESITI P.C.** THIS INFORMATION IS INTENDED SOLELY FOR USE BY THE INDIVIDUAL ENTITY NAMED AS THE RECIPIENT HEREOF. IF YOU ARE NOT THE INTENDED RECIPIENT, BE AWARE THAT ANY DISCLOSURE, COPYING, DISTRIBUTION, OR USE OF THE CONTENTS OF THIS TRANSMISSION IS PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY.

*** PLEASE DELIVER IMMEDIATELY ***

Date: July 11, 2002

From: Wayne F. Reinke (e-mail: WFR@hrlmlaw.com)

No. of Pages: 2 (Including this Page)

Fax No.: (703) 872-9314

To: Examiner Andrew L. Snizek
Art Unit 2651
U.S. Patent and Trademark Office
Washington, D.C.

Re: U.S. Patent Application Serial No.: 09/723,362
Applicants: Chainer et al.
Attorney Docket No.: YOR919940252US11
Our File No.: 0559.055J

Message: Pursuant to your request, attached please find a copy of page 3 of the Response to Office Action filed on March 27, 2002.

WFR:rqs
Enclosure
0559055J-FAX01-Snizek

-3-

YOR919940252US11

Therefore, Applicants submit that claim 25 cannot be anticipated by Yamakoshi et al. Claim 53 is an apparatus claim corresponding to method claim 25. Thus, the remarks made above with respect to claim 25 are equally applicable thereto.

Claim 60 recites a method for determining systematic time delays in the writing of trigger patterns on a storage medium of a storage device. The method comprises taking a plurality of measurements of at least one trigger pattern at a plurality of radial positions, and using the measurements to determine at least one systematic time delay.

Applicants submit that Yamakoshi et al. fails to disclose, for example, the taking step of claim 60. In fact, a computer search of Yamakoshi et al. reveals that the term "trigger pattern" is not even used. Thus, Applicants question how Yamakoshi et al. could possibly disclose taking a plurality of measurements of at least one trigger pattern at a plurality of radial positions, as claimed in claim 60. Moreover, Yamakoshi et al. also could not disclose using those measurements, let alone using them to determine at least one systematic time delay, as claimed in claim 60.

Therefore, Applicants submit that claim 60 cannot be anticipated by Yamakoshi et al. Claim 66 is an apparatus claim corresponding to method claim 60. Thus, the remarks made above with respect to claim 60 are equally applicable thereto.

Applicants submit that the dependent claims are allowable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their additional limitations.

For example, claim 26 recites that detecting the one or more circumferential systematic errors comprises computing an integral correction value for a time interval, wherein a non-zero integral indicates a circumferential error. Applicants submit there is nothing in Yamakoshi et al. regarding an integral correction value, and the Office Action